

Before the
UNITED STATES COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of

**DETERMINATION OF RATES AND TERMS
FOR DIGITAL PERFORMANCE OF SOUND
RECORDINGS AND MAKING OF
EPHEMERAL COPIES TO FACILITATE
THOSE PERFORMANCES (WEB V)**

**Docket No. 19–CRB–0005–WR
(2021–2025)**

**SERVICES’ UNOPPOSED MOTION FOR LEAVE
TO FILE CORRECTED REPLY TO SOUNDEXCHANGE’S
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Pandora Media, LLC, Sirius XM Radio Inc., Google LLC, the National Association of Broadcasters, and the National Religious Broadcasters Noncommercial Music License Committee (collectively, the “Services”) respectfully move for leave to submit the attached Corrected Reply to SoundExchange’s Proposed Findings of Fact and Conclusions of Law (“Corrected Reply”). SoundExchange does not oppose this motion.

The Corrected Reply corrects various typographical and other non-substantive errors in the Services’ Reply to SoundExchange’s Proposed Findings of Fact and Conclusions of Law (Doc. No. 22872, filed Oct. 28, 2020) (“Reply”), including errors in paragraph numbering and citation formatting. The Corrected Reply is attached to this motion as Exhibit A, and a redline showing the proposed corrections is attached as Exhibit B.

The Judges have the statutory authority to grant the requested relief. *See* 17 U.S.C. § 801(c) (empowering the Judges to “make any necessary procedural or evidentiary rulings in any proceeding under this chapter”).

CONCLUSION

For the foregoing reasons, the Services respectfully ask the Judges to grant their unopposed motion and enter the accompanying Proposed Order directing them to file the Corrected Reply attached as Exhibit A hereto.

November 11, 2020

Respectfully submitted,

/s/ Todd D. Larson

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EXHIBIT A

RESTRICTED – Subject to Protective Order in Docket No. 19-CRB-0005-WR (2021-2025)

EXHIBIT B

RESTRICTED – Subject to Protective Order in Docket No. 19-CRB-0005-WR (2021-2025)

Proof of Delivery

I hereby certify that on Wednesday, November 11, 2020, I provided a true and correct copy of the Services' Unopposed Motion to File Corrected Reply to SoundExchange's Proposed Findings of Fact and Conclusions of Law (Public) to the following:

Sony Music Entertainment, represented by David A. Handzo, served via ESERVICE at dhandzo@jenner.com

Educational Media Foundation, represented by David Oxenford, served via ESERVICE at doxenford@wbklaw.com

SoundExchange, Inc., represented by David A. Handzo, served via ESERVICE at dhandzo@jenner.com

Warner Music Group Corp., represented by David A. Handzo, served via ESERVICE at dhandzo@jenner.com

Jagjaguwar Inc., represented by David A. Handzo, served via ESERVICE at dhandzo@jenner.com

American Federation of Musicians of the United States and Canada, The, represented by David A. Handzo, served via ESERVICE at dhandzo@jenner.com

SAG-AFTRA, represented by David A. Handzo, served via ESERVICE at dhandzo@jenner.com

UMG Recordings, Inc., represented by David A. Handzo, served via ESERVICE at dhandzo@jenner.com

American Association of Independent Music ("A2IM"), The, represented by David A. Handzo, served via ESERVICE at dhandzo@jenner.com

Signed: /s/ Todd Larson